

UNITED STATES DISTRICT COURT

EXHIBIT "I"

FOR _____ DISTRICT OF PUERTO RICO

Angel David Morales-Vallelanes

EXHIBIT LIST

V.

United Postal Service

CASE NUMBER: 97-2459(HL)

PRESIDING JUDGE					PLAINTIFF'S ATTORNEY	DEFENDANT'S ATTORNEY
Héctor Laffitte					Miguel E. Miranda	
TRIAL DATE(S)					COURT REPORTER	COURTROOM DEPUTY
April 14, 1999						
PLP NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS*	
1			E		Letter to Mr. Pedro Reyes	
2			E		Forms 1767 submitted on 1991	
3			E		Forms 1767 submitted on 1995	
4			E		Forms OSHA-7 (Notice 4/7/95)	
5			E		Letter to plaintiff by José Carpena	
6			E		Letter from Odarit Tirado to J. Carpena 6/21/95	
7			E		Statement by plaintiff 6/29/95	
8			E		Statement by plaintiff 6/3/95	
9			E		OWCP Form CA-1 7/3/95	
10			E		Letter from José Carpena 7/5/95	
11			E		Letter from José Carpena 8/1/95	
12			E		PS Form 2564-A Precomplaint 2/20/96	
13			E		Letter from José Carpena to plaintiff 2/23/96	
14			E		Memorandum Feb. 27, 1996	
15			E		Statement by plaintiff March 7, 1996	
16			E		Certified letter plaintiff to J. Carpena 3/19/96	
17			E		Letter Warning to plaintiff March 26, 1996	
18			E		Certified letter to John Malavé March 23, 1996	
19			E		Certified letter from plaintiff March 26, 1996	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

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EXHIBIT AND WITNESS LIST – CONTINUATION

VS.					CASE NO.
PLF. NO.	DEF. NO.	DATE OFFERED	Marked	Admitted	DESCRIPTION OF EXHIBITS AND WITNESSES
20			E		Letter to plaintiff K. Clark dated April 1, 1996
21			E		PS Form 2565 EEO dated April 2, 1996
22			E		Certified letter to John Malavé dated April 6, 1996
23			E		Letter by Dr. Luz M. Cuebas dated April 10, 1996
24			E		PS Form 2564-A dated April 25, 1996
25			E		Statement by coworker Raymond Ruiz
26			E		Statement by coworker Howard Hall
27			E		Statement by Julia Collado
28			E		Certified letter sent to plaintiff Bruce A. Dubay 4/29/96
29			E		Letter sent to plaintiff by Jose Carpena 10/1/96
30			E		Certified letter sent to APWU Pres. Héctor Torres 6/14/96
31			E		Letter sent by fax to John Malavé on June 27, 1996
32			E		Statement and Claim for Damage by plaintiff dated 7/10/96
33			E		Statement by coworker Angel Baerga on July 31, 1996
34			E		Certified letter sent to John E. Plummer by plaintiff 8/4/96
35			E		Letter to John Malavé dated August 9, 1996
36			E		Statement by Raymond Ruiz on September 3, 1996
37			E		PS Form 2565 dated September 4, 1996
38			E		Certified letter by Bruce A. Dubay to plaintiff 9/30/96
39			E		Letter to plaintiff by John E. Plummer 10/6/96
40			E		Letter by José Carpena to plaintiff on 11/1/96
41			E		Certified letter to plaintiff to José Carpena dated 11/11/96
42			E		Letter to Jose Carpena to plaintiff on 1/10/97
43			E		Written communication by plaintiff on 12/7/96
44			E		Letter of Warning to plaintiff dated 12/13/96
45			E		Certified letter by plaintiff to John Malavé 12/16/96

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EXHIBIT AND WITNESS LIST – CONTINUATION

VS.					CASE NO.
PLF. NO.	DEF. NO.	DATE OFFERED	Marked	Admitted	DESCRIPTION OF EXHIBITS AND WITNESSES
46			E		Letter from plaintiff to USPS Caparra Heights Station
47			E		Notice of Suspension of seven days to plaintiff 12/20/96
48			E		Letter by OWCP Claim Examiner to plaintiff 1/15/97
49			E		Statement signed by coworker Carmelo Montañez 1/21/97
50			E		PS Form Information for Precomplaint Counseling 12/16/96
51			E		Statement signed by plaintiff to the Caparra Heights 12/28/96
52			E		Certified letter by plaintiff John Malavé 12/30/96
53			E		Certified letter by plaintiff to EEO 12/30/96
54			E		Written communication from Enrique López to plaintiff 1/10/97
55			E		Notification to APWU Daniel Soto by employees of the CaparraSta
56			E		Letter by APWU Vice-Pres. Luz Z. Calendar dated 1/14/97
57			E		Certified letter by plaintiff to the Postal Inspection 1/16/97
58			E		Letter APWU Pres.Daniel Soto to Luis Hernández 1/17/97
59			E		Letter by Enrique López to plaintiff 1/17/99
60			E		Letter by plaintiff to the Office of the Special Coun.1/22/97
61			E		PS Form 2564-A dated January 23, 1997
62			E		Letter by José Carpena to Plaintiff dated 1/22/97
63			E		Communication written by Frank A. Trinidad 1/28/87
64			E		Documents relative to grievance as requested dated1/30/97
65			E		Letter by plaintiff to José Carpena 2/1/97
66			E		Letter by plaintiff APWU Daniel Soto dated 2/3/97
67			E		Group grievance #97-156, 97-157, 97-158, 97-159
68			E		OWCP Form CA-1 dated 2/5/97
69			E		Letter by APWU Daniel Soto to plaintiff 2/6/97
70			E		Certified letter by plaintiff to Virginia Matías 2/6/97
71			E		Letter by plaintiff APWU Daniel Soto 2/7/97

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EXHIBIT AND WITNESS LIST - CONTINUATION

VS.					CASE NO.
PLF. NO.	DEF. NO.	DATE OFFERED	Marked	Admitted	DESCRIPTION OF EXHIBITS AND WITNESSES
72			E		Letter (2nd) by plaintiff to Daniel Soto 2/7/97
73			E		Certified letter by plaintiff to Gail Sonneberg 2/7/97
74			E		Letter by Daniel Soto to plaintiff 2/10/97
75			E		Letter by Daniel Soto (2nd) to plaintiff 2/10/97
76			E		Statement by coworker Howard hall 2/10/97
77			E		Certified letter by plaintiff to John Malavé 2/10/97
78			E		Assignment Order Trans FORM PS Form 1723 2/14/97
79			E		Letter by Alice Womack to plaintiff 2/18/97
80			E		Certified letter to M. Chap Claims Examiner 2/28/97
81			E		Certified letter by plaintiff to Virginia Matías 3/1/97
82			E		Certified letter by Postal Inspector Ivette O'Neill 3/6/97
83			E		Certified letter by plaintiff to Ivette O'Neill 3/8/97
84			E		Step 2 Grievance Appeal Form #97-280 3/10/97
85			E		Letter by Enrique López to Alberto Ortiz 3/7/97
86			E		Certified letter by plaintiff to John Malavé 3/11/97
87			E		Letter by plaintiff to Daniel Soto 3/17/97
88			E		Statement by María Reyes 3/21/97
89			E		Letter by plaintiff to Daniel Soto 3/26/97
90			E		Statement for authorization by plaintiff 3/31/97
91			E		Certified letter by Daniel Soto to plaintiff 3/31/97
92			E		Step 2 Decision APWU #97-280 by Rafael De Jesús 4/7/97
93			E		PS Form 3971 dated 4/2/97
94			E		OWCP Form CA-20 dated 3/27/97
95			E		OWCP CA-7 dated 4/1/97
96			E		OWCP Form CA-8 dated 4/16/97
97			E		Certified letter by plaintiff to Jose Carpena 4/22/97

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EXHIBIT AND WITNESS LIST – CONTINUATION

VS.					CASE NO.
PLF. NO.	DEF. NO.	DATE OFFERED	Marked	Admitted	DESCRIPTION OF EXHIBITS AND WITNESSES
98			E		Certified letter by plaintiff to Rafael de Jesús 4/22/97
99			E		Certified letter by plaintiff to John Malavé 4/23/97
100			E		Certified letter by plaintiff to José Carpena 4/23/97
101			E		Letter by plaintiff to Daniel Soto 4/30/97
102			E		Certified of Attendance subscribed by Iris J. Tous
103			E		Letter by Francisco Girau to plaintiff dated 4/21/97
104			E		OWCP Form CA-8 dated 5/6/97
105			E		Letter by John Vlachos to plaintiff 4/28/97
106			E		Certified letter by plaintiff to Harry Romney 5/7/97
107			E		Written communication by Harry Romney to plaintiff 5/7/97
108			E		Certified letter by plaintiff to Frank Girau 5/10/97
109			E		Letter by plaintiff to Daniel Soto 5/20/97
110			E		Certified letter by plaintiff to John Malavé 5/20/97
111			E		Certified letter by plaintiff to John Vlachos 5/28/97
112			E		OWCP Form CA-8 dated 5/23/97
113			E		Certified letter by plaintiff to Frankie Hernández 5/30/97
114			E		Statement from Dr. Guillermo Hoyos 1/15/98
115			E		Statement from Dr. Ricardo Canals 11/25/96
116			E		
117			E		Two medicals certifications from Dr. Hoyos and Dr. Rdgz. 2/21/97
118			E		Puerto Rico Area Local Actual Constitution 1/1/97
119			E		OWCP Form CA-20 dated 4/10/97
120			E		Letter by Dr. Victor Irizarry to Donna Robinson 6/6 /97
121			E		Certified letter by plaintiff to Harry Romney 7/24/97
122			E		OWCP Form CA-8 dated 8/25/97
123			E		Two letter by plaintiff to Daniel Soto 9/5/97

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EXHIBIT AND WITNESS LIST – CONTINUATION

VS.					CASE NO.
PLF. NO.	DEF. NO.	DATE OFFERED	Marked	Admitted	DESCRIPTION OF EXHIBITS AND WITNESSES
124			E		Letter by plaintiff to Daniel Soto 9/8/97
125			E		OWCP Form CA-8 dated (/11/97
126			E		Memorandum from Daniel Soto 9/12/97
127			E		Letter by plaintiff to Daniel Soto 9/13/97
128			E		EEO file case number 4A-006-1034096
129			E		Letter by Daniel Soto to plaintiff 9/22/97
130			E		Certified letter by Daniel Soto to plaintiff 9/26/99
131			E		OWCP Form CA-8 dated 9/24/97
132			E		Letter by Terry Friend dated 9/26/97
133			E		Step 2 Decision APWU#97-1179 signed by Rafael De Jesús 10/3/97
134			E		Certified letter from plaintiff to Robert H. Cohen 10/6/97
135			E		Certified letter by plaintiff to Rafael de Jesús 10/7/97
136			E		Letter to Rafael De Jesús to plaintiff 10/6/97
137			E		Letter by plaintiff to Terry Friend 10/21/97
138			E		OWCP Form CA-8 10/24/97
140			E		Certified letter by Daniel Soto to plaintiff 10/26/97
141			E		OWCP Form CA-7 10/28/97
142			E		Letter by plaintiff to Terri Friend 10/28/97
143			E		Letter by Daniel Soto to Juan Cruz Ocasio 10/29/97
144			E		Step 2 Grievance Appeal Form #97-1291 10/29/97
145			E		Letter by plaintiff to Terry Friend 11/13/97
146			E		Letter by plaintiff to Daniel Soto 11/18/97
147			E		Letter Daniel Soto to plaintiff 11/19/97
148			E		OWCP Form CA-8 11/24/97
149			E		Letter by plaintiff to Officer Millie Burgos 11/25/97
150			E		Certified letter by plaintiff to John Malavé 11/25/97

EXHIBIT LIST – CONTINUATION

CASE NO.

DESCRIPTION OF EXHIBITS AND WITNESSES

Plaintiff to John Malavé 12/5/97

Shelley Lipton to plaintiff 12/8/97

Plaintiff to Officer Millie Burgos 12/5/97

Letter by plaintiff to Daniel Soto 12/15/97

Letter by plaintiff 12/15/97

Letters sent by USP to plaintiff 1/3/97

Plaintiff to Carlos Rodríguez 8/31/98

Ermen Berríos, Triple S, 11/16/97

Letter by plaintiff to John Malavé 11/24/97

Service Handbook EL-801 3/30/95

Letter by plaintiff to John Malavé 2/24/98

John Malavé to plaintiff March 23, 1998

Carlos I. Rodríguez 5/27/98

Plaintiff to Carlos Rodríguez 5/28/98

165		ID	✓	Several medical evaluations Dr. Guillermo Hoyos
166		ID	✓	Plaintiff tax returns form 1993 to 1997
167		ID	✓	Economic report and curriculum vitae of Vicente Feliciano
168		E		Plaintiff personal data at USP